Holland & Knight

601 SW Second Avenue, Suite 1800 | Portland, OR 97204 | T 503.243.2300 | F 503.241.8014 Holland & Knight LLP | www.hklaw.com

J. Matthew Donohue +1 503-517-2913 Matt.Donohue@hklaw.com

May 23, 2022

Via Electronic Mail

Hon. Steven C. Seeger Dirksen United States Courthouse 219 South Dearborn Street, Chambers 2378 Chicago, IL 60604

Re: NEXT Payment Solutions, Inc. v. CLEAResult Consulting, Inc.

Case No. 1:17-cy-08829

Dear Judge Seeger:

The parties met and conferred pursuant to your January 26, 2022 Minute Order (Dkt No. 544.) Despite good faith efforts, the parties were unable to narrow any of the substantial disputed issues reflected in pending motions before the Court (Dkt. Nos. 460, 489, 490, 508, 510, 518, and 521.)

Immediately following the Court's resolution of the pending motions, the parties expect to be able to agree on evidentiary stipulations, among other things. CLEAResult also believes that the Court's resolution of the pending motions will allow the parties to meaningfully revisit settlement discussions before the July 13, 2022 final pretrial conference and the two-week trial currently set to begin August 1, 2022.

Sincerely yours,

HOLLAND & KNIGHT LLP

s/ J. Matthew Donohue

J. Matthew Donohue

cc: Counsel for NEXT Payment Solutions